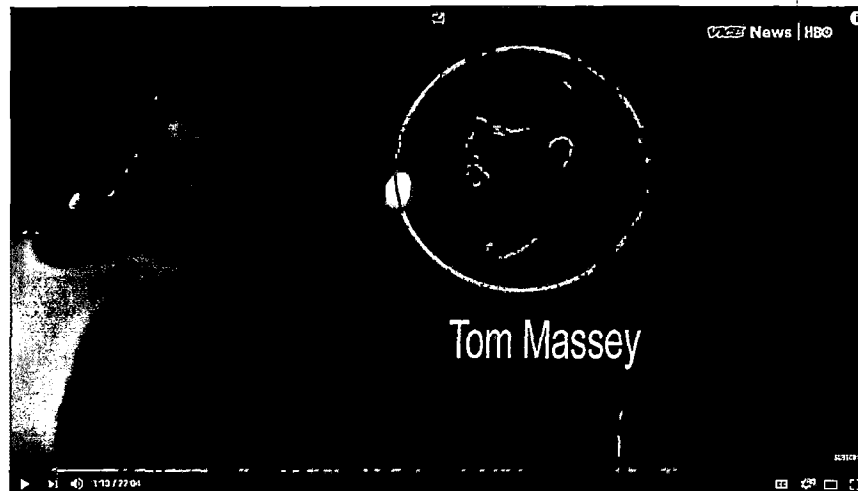




b. Thomas Massey, of Philadelphia, threw the first punches of the August 11th demonstration at UVA, and would continue fighting through August 12th.

i. Massey can be seen here, in footage from the Vice News video



ii. See Exhibit1-Charge.mp4, at the end of which, Thomas Massey can be seen launching the first attack, which set off all the violence of the weekend in question.

iii. See that attack from another angle in Exhibit2-Attack.mp4

iv. See Exhibit4-CantwellDefends.mp4, in which Beanyman and Tom Massey can both be seen attacking the man in the white tank top.

v. In Exhibit4-CantwellDefends.mp4, Beanyman and Tom Massey can both be seen attacking the man in the white tank top, BEFORE Cantwell deploys his pepper spray.

- vi. Thomas Massey was quoted in the Washington Post after his arrest for rioting on the day of President Trump's Inauguration;

"I think there should have been more violence yesterday," said Massey, who was among those arrested. Asked if he participated in the violence, Massey replied, "There were some rocks thrown." He said that he hopes next time, demonstrations will be "more successful. I'll get to punch a Nazi. I didn't get to do that yesterday. The police stopped me."

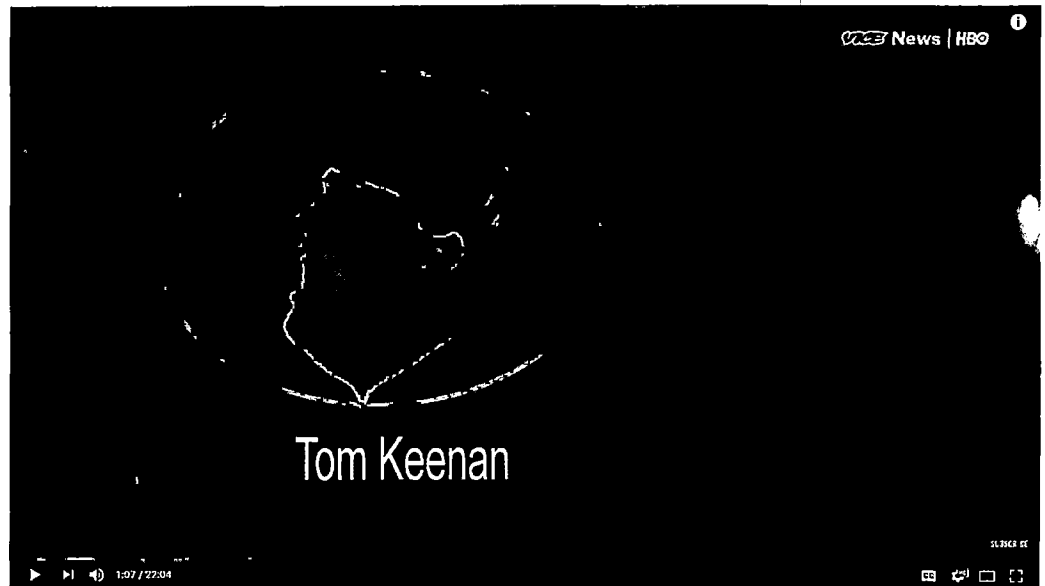
https://www.washingtonpost.com/local/public-safety/protesters-who-destroyed-property-on-inauguration-day-part-of-well-organized-group/2017/01/21/096678c8-dfeb-11e6-ad42-f3375f271c9c_story.html

- vii. After the events here in dispute, Massey was later charged with robbery and ethnic intimidation of two US Marines, when he and his co-conspirators did to two US Marines, what they tried to do to Defendants in Charlottesville.

<https://www.phillymag.com/news/2018/12/13/marines-assaulted-philadelphia-keen-an-massey-antifa/>

- c. Tom Keenan, also of Philadelphia, was there and involved in initiating the violence.

- i. Keenan can be seen in the Vice News footage of the event



- ii. Keenan had been arrested as far back as 2007 for breaking the windows out of an FBI vehicle which he thought belonged to some White Supremacists he had been stalking on the streets of Philadelphia.

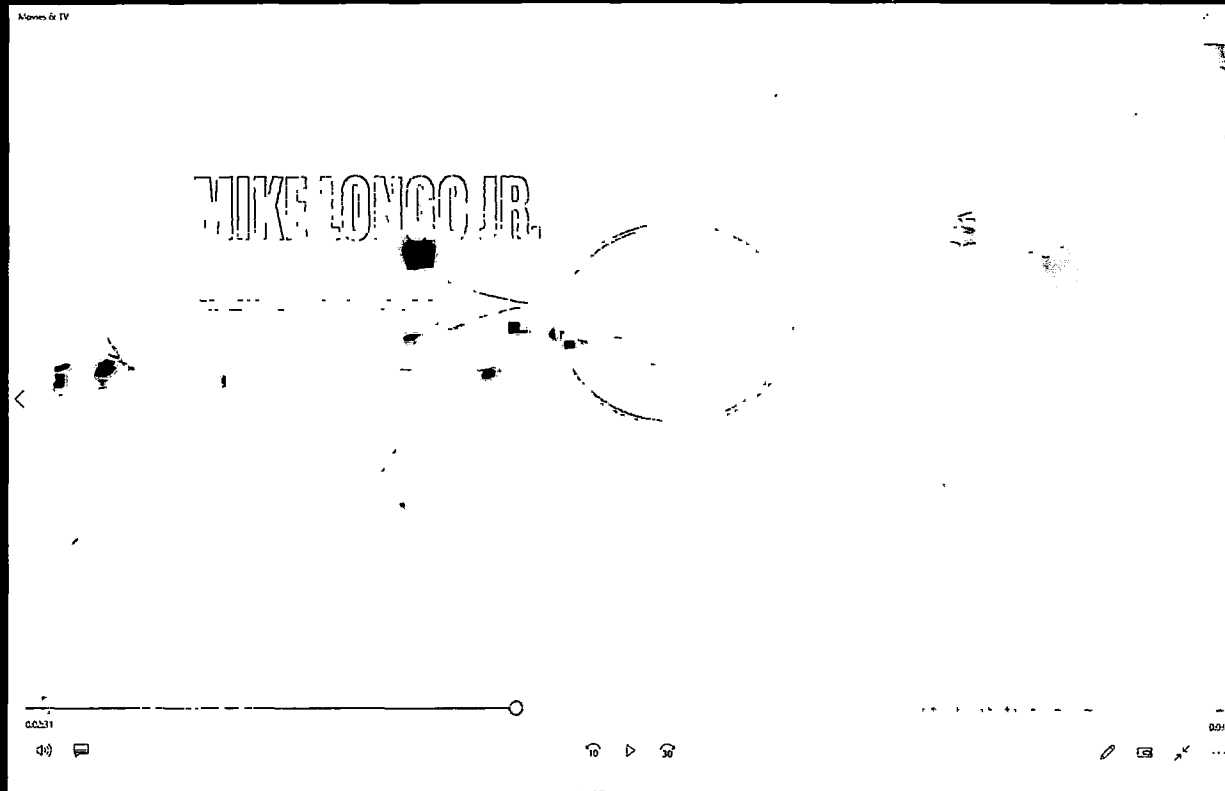


<http://antiantifa-usa.blogspot.com/2009/05/philadelphias-love-park-4-begging-for.html>

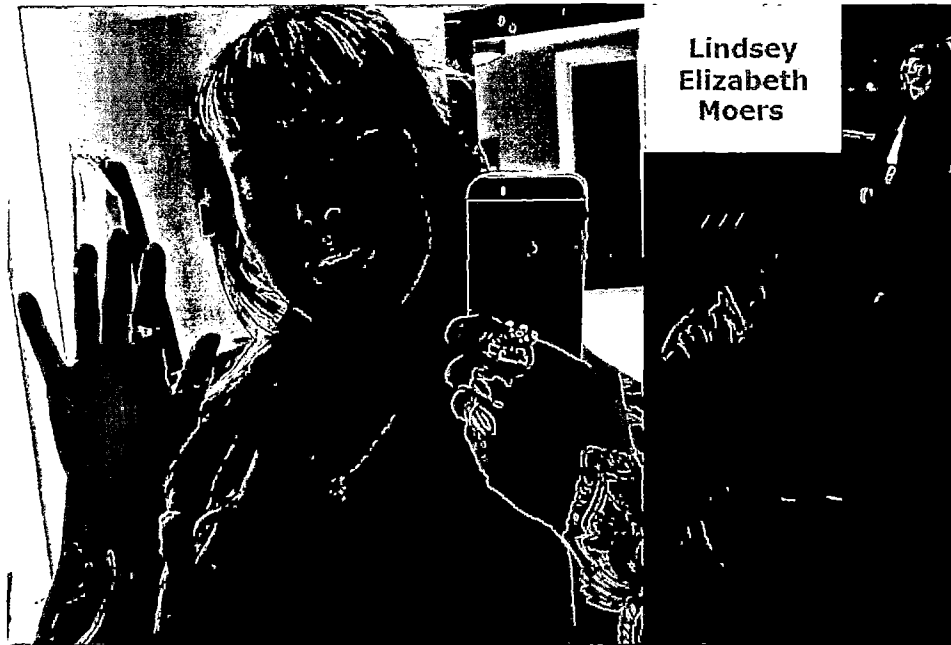
iii. Keenan is also charged as Massey's co-defendant in the aforementioned robbery and ethnic intimidation case, for doing to two US Marines what they attempted to do to Defendants in Charlottesville.

<https://www.phillymag.com/news/2018/12/13/marines-assaulted-philadelphia-keenan-massey-antifa/>

d. Mike Longo Jr., also of Philadelphia, who was already on probation (See Exhibit11-MikeLongoCPRreport.pdf) in his home city for fighting when he came to Charlottesville that weekend, was seen with pepper spray at UVA on August 11th, and pepper sprayed Cantwell on August 12th, as well as a reporter.



- e. Lindsay Elizabeth Moers, also of Philadelphia, who has been violent at numerous demonstrations, was swinging an expandable baton at Defendants at UVA on August 11th, and on August 12th.



168. Other than to say that Plaintiffs' associates were anything but peaceful, and that Defendant Cantwell had neither torch nor fluid to throw, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

169. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any

allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

170. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

171. Defendant Cantwell pepper sprayed a violent criminal who is not party to this suit, and did nothing to any “protesters”.

a. In this often-cited photograph of Defendant Cantwell trying to stop a violent criminal (Who we’ll call “Beanyman” for sake of his hat), note the injury which had already been sustained by another rallygoer before Cantwell intervened.

b.



- c. See Exhibit1-Charge.mp4, at the end of which, Thomas Massey can be seen launching the first attack, which set off all the violence of the weekend in question.
- d. See that attack from another angle in Exhibit2-Attack.mp4
- e. See Exhibit4-CantwellDefends.mp4, in which Beanyman and Tom Massey can both be seen attacking the man in the white tank top.
- f. In Exhibit4-CantwellDefends.mp4, Beanyman and Tom Massey can both be seen attacking the man in the white tank top, BEFORE Cantwell deploys his pepper spray.

g. Defendant Cantwell was too busy dealing with the violence of Antifa to worry about what other people said on the Internet.

h. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

172. This is a lie, disproven by video

173. Pepper sprayed by who, exactly? Emily Gorcenski was pepper sprayed by Beanyman. Plaintiffs other criminal associates also deployed pepper spray, and it is not alleged, nor is any evidence is provided, that these alleged injuries were sustained at the hands of rallygoers, much less any defendant in this suit.

a. This claim also seems to be contradicted by prior claims of being unable to leave, indeed that they were so terrified that they dared not struggle.

b. If Romero had been pepper sprayed, it seems odd that no police report of this assault has been produced. Albemarle County was not shy

about prosecuting people in thin claims, not even those contradicted by video evidence.

- c. So, although Cantwell has no idea what caused Romero's insomnia, this claim is likewise denied, and Defendant demands to see strict proof.

174. Defendant Cantwell was too busy recovering from pepper spray deployed against him by Beanyman, which incapacitated him, when this supposed victory celebration was allegedly taking place. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

175. This is a lie, disproven by ALL evidence, and Plaintiffs know it. This is a malicious and purposeful material deception upon this Court.

- a. Defendant Cantwell conditioned his participation in the UVA on police protection, as shown in Exhibit10-MeetClip.mp3
- b. Defendants tried to keep the UVA demonstration a secret, so as to avoid precisely this outcome

- c. The attendance of Philly Antifa, who started all the violence, contradicts the claim of “peaceful protesters” being “students and community members”
- d. As shown in Exhibit1-Charge.mp4, Plaintiffs had ample opportunity to escape.
- e. According the Plaintiffs’ own complaint, the Plaintiffs sought out Defendants, and not the other way around.
- f. Unlike Defendants, who coordinated with law enforcement throughout the events here in dispute, Plaintiffs and their criminal co-conspirators specifically chose not to inform law enforcement of their activities.



Emily G ✓
@EmilyGorcenski

One of my favorite parts of the "Emily is a fed" criticism is that when the decision was made to not show up on August 11, I was asked to call the cops to tell them about the torch march, and I refused.



ruth badrd ginsberg @isisRVA · Sep 20

In order to do something you apparently have to lick the boots of those that turned the other cheek when we were almost murdered and then somehow make the entire narrative about you but yeah you keep on keeping on buddy
[twitter.com/EmilyGorcenski...](https://twitter.com/EmilyGorcenski)

1:47 AM · Sep 20, 2019 · Twitter for iPhone

4 Retweets 43 Likes



Emily G ✓ @EmilyGorcenski · Sep 20
Replying to @EmilyGorcenski

There were quite a lot of antifascist groups in Virginia when August 11 happened. Yet somehow there were only about 30-40 people at UVa, most students and community members.

Instead of mutual aid, we were explicitly expected to rely on the cops.



1



29



Emily G ✓ @EmilyGorcenski · Sep 20

"Emily, will you use your social media profile to help us spread awareness about what's happening in Charlottesville this summer" was the *explicit* request I was asked in 2017. I was *literally asked to be public and identifiable*.



Stig @Carzonfye · Sep 20

Replying to @msgrvideogames @GilesShurtleff and 5 others

This is so naive it's bordering on malicious.

g.

176. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

177. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

178. Wispelwey had no such “reasonable” concern, as evidenced by the fact that he and his associates CHOSE at every step of this process, to participate, and to confront Defendants and their associates, instead of staying home and minding their own business. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

179. This defies all reason.

- a. Supposedly the Plaintiffs were so concerned about violence, well in advance of Defendants arrival, that they had to clear their houses of worship of all valuables and precious documents.
- b. Then, Plaintiffs decided hold an off schedule religious ceremony, mere feet from Defendants demonstration.

- c. A demonstration which Defendants tried to keep secret so as to avoid this very outcome, and which was only discovered through the spying and deceptions of Plaintiffs' associates.
- d. A demonstration which Defendant Cantwell conditioned his participation in, on the cooperation of law enforcement.
- e. They chose to bring children and the elderly to this ceremony, despite fearing for their safety in advance of Defendants' arrival.
- f. After the Plaintiffs' associates had engaged in a premeditated assault against Defendants, attendees of the ceremony stayed past the children's bedtime, for fear of violence by the Defendants who had just been assaulted.
- g. They decided to repeat the whole thing over again, the very next day, and still pretended to be hapless victims.
- h. Plaintiffs did not see fit to coordinate with law enforcement, despite this supposedly "reasonable" fear.
- i. While Defendant Cantwell has no idea what was going through the Plaintiffs' minds, nor any clue as to what they were doing while he was defending himself from a premeditated assault by Plaintiffs' Antifa associates, this story is so completely ridiculous as to be beyond belief.

180. Defendant Cantwell is confident he saw no baseball bats being carried by rallygoers, and challenges anyone to find a single image depicting any such thing in the abundance of video there was of these events.

- a. Defendants other than Cantwell had torches, to engage in a lawful demonstration.
- b. Those torches only became defensive instruments after Defendants were attacked by Plaintiffs' Antifa associates.
- c. Plaintiffs' psychic powers to determine the intent of perfect strangers remains unexplained, and hardly constitutes evidence of any such intent.

181. While Defendant Cantwell was not party to this exchange, note that this perfectly legal exchange between two people on the street is not a crime.

- a. Further note that anytime a specific defendant and a specific Plaintiff are mentioned, this is precisely the case.
- b. Nowhere in this complaint does an identified Plaintiff identify any Defendant as having committed a crime against them.
- c. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually

inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

4) Defendants were happy to have escaped with their lives after being assaulted by Plaintiffs' associates.

182. Note that this is not a crime, nor evidence of illegal intent. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

183. Note that these are not crimes, nor evidence of illegal intent. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

184. Note that these are not crimes, nor evidence of illegal intent. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph,

and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

185. Note that these are not crimes, nor evidence of illegal intent. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

B. Saturday, August 12, 2017

1) Plaintiffs And Their Associates Intentionally Planned A Violent Confrontation With Defendants

186. This is a lie, and Plaintiffs know it.

- a. Other than a bunch of edgy posts by unnamed and pseudonymous “participants” and “co-conspirators” on Discord, which themselves prove nothing, no evidence of a violent conspiracy has been provided, because one never existed.
- b. One of the meetings where violence was allegedly planned was caught on Defendant Cantwell’s body camera, and provided during discovery. That video proves that THE EXACT OPPOSITE was planned, and

Defendants instead talked about coordinating with law enforcement, and the American Civil Liberties Union. See Exhibit10-MeetClip.mp3

c. The whole entire point of securing the permit, fighting in court to see it honored, securing the perimeter, and coordinating with law enforcement, was to prevent the violence which was vowed by Plaintiffs' Antifa associates.

d. Despite Defendants best efforts to make this a peaceful event, Cantwell was pepper sprayed, without provocation, by Plaintiffs' co-conspirator Mike Longo Jr. before he even got near the park, and had to be carried. See Exhibit6-CantwellMaced.mp4 and Exhibit7-CantwellMacedFirstPerson.mp4

187. The quotes here provided show nothing of the sort, and Plaintiffs again seem to rely on psychic powers in place of evidence to determine the intent of Defendants. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

188. The quotes here provided show no criminal intent, and Plaintiffs again seem to rely on psychic powers in place of evidence to determine the intent of Defendants. Aside from that, answering Defendant is without knowledge or

information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

189. The quotes here provided show no criminal intent, and Plaintiffs again seem to rely on psychic powers in place of evidence to determine the intent of Defendants. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

190. The quotes here provided are not attributed to any Defendant, show no criminal intent, and Plaintiffs again seem to rely on psychic powers in place of evidence to determine the intent of Defendants. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

191. The quotes here provided show no criminal intent, are mostly unattributed to any Defendant, and Plaintiffs again seem to rely on psychic

powers in place of evidence to determine the intent of Defendants. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

192. Defendants took many steps to prevent violence, and Plaintiffs knowingly, maliciously, willfully, and materially, deceive this Court by saying otherwise.

- a. Defendants applied for a permit.
- b. Defendants tried to keep their plans secret, to avoid confrontations with Plaintiffs.
- c. Defendants declined to engage Plaintiffs' Antifa criminal co-conspirators when they had a choice, such as in the Walmart parking lot on August 11th.
- d. Defendants called law enforcement to coordinate the UVA torch march, and specifically that Defendant Cantwell conditioned his participation in that event on police being present. (See Exhibit10-MeetClip.mp3)

- e. Cantwell repeatedly warned his audience to remain in compliance with the law, especially if they were carrying weapons. See Exhibit24-UTR-Updates-Blogpost.pdf
 - f. Cantwell wore a body camera throughout the events in dispute.
 - g. Cantwell spoke to a Charlottesville Detective on July 17th. See Exhibit17-CPDDetective20170717.mp3
 - h. Cantwell warned his party not to engage Philly Antifa in the Walmart parking lot on August 11th.
 - i. After the fight at UVA, Cantwell asked Mosley to put him in touch with his contacts in local law enforcement. See Exhibit18-SMS.xlsx
 - j. While Cantwell was recovering from Mike Longo Jr.'s pepper spray assault, someone he could not see, said "We're gonna kill em!" and Cantwell replies "Don't kill anybody!" See Exhibit9-DontKill.mp4
193. If this is true, Defendant Cantwell wants to become a Plaintiff.
- a. At the August 11th meeting captured on Defendant Cantwell's body camera, Mosley and Kurt described a detailed plan to get speakers in and out of the park safely, without coming into contact with Plaintiffs' Antifa associates.

- b. Defendant Cantwell conditioned his participation on the events being legal and in coordination with law enforcement.
- c. Even in the event the ACLU did not win our court case, Cantwell was under the impression, and relayed to his audience, that law enforcement still planned to let us into the park safely, and to provide a smaller corner thereof for our use. See Exhibit24-UTR-Updates-Blogpost.pdf
- d. If the event organizers called off police protection, then they violated their agreement with Defendant Cantwell, and in the process caused him tremendous suffering and financial hardship.
- e. Aside from that, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

194. There was no formation when Cantwell arrived. While carrying a camera, Defendant Cantwell tried to walk to the park through a gauntlet of violent criminals who threw things at him, and pepper sprayed him.

- a. Despite having a licensed pistol in his waist, he showed restraint enough not to shoot them.
- b. Many of those semi-automatic weapons belonged to associates of the Plaintiffs, such as Dwayne Dixon and his armed communists of Redneck Revolt. See Exhibit23-DixonConfession.mp4
- c. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

195. Defendant Cantwell was pepper sprayed without provocation by Plaintiffs' associate Mike Longo Jr. while walking to the park, as shown in Exhibit6-CantwellMaced.mp4 and Exhibit7-CantwellMacedFirstPerson.mp4, and was thus unaware of almost anything that happened after. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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200. Defendant Cantwell was pepper sprayed without provocation by Plaintiffs' associate Mike Longo Jr. while walking to the park, as shown in Exhibit6-CantwellMaced.mp4 and Exhibit7-CantwellMacedFirstPerson.mp4, and was thus unaware of almost anything that happened after. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of

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211. The quotes here provided show only men discussing defense against the premeditated assault perpetrated by Plaintiffs' Antifa associates. Defendant Cantwell finds in uncontroversial that men who survived the assault by Plaintiffs and their co-conspirators felt good about getting out alive, but is unable to speak to who posted what online. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

212. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any

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214. Once inside the park, Defendants hoped to remain separated from the violent criminal associates of Plaintiffs, and only came into contact with said criminals when police forced Defendants out. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

215. The plan, as well established, was to attend a demonstration at a park. The assault was carried out by Plaintiffs' associates, and Defendants were compelled to defend themselves using whatever was available.

216. The quotes here provided show no criminal intent, and Plaintiffs again seem to rely on psychic powers in place of evidence to determine the intent of Defendants. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

217. Other than the "incite a riot" post not attributed to any Defendant, the quotes here provided show no criminal intent, and Plaintiffs again seem to rely on psychic powers in place of evidence to determine the intent of Defendants. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

218. This is ridiculous.

- a. Plaintiffs seriously expect people to believe, that after all the supposedly reasonable fear they had expressed in the 200+ prior

paragraphs, after clearing their houses of worship of precious relics, and after claiming to have been assaulted without provocation the prior evening, that;

- b. Plaintiff Pearce decided to make a duct tape star of David, and;
- c. Wear an LGBT rainbow shirt, and;
- d. "Peacefully protest" the alleged Nazis she was supposedly so certain intended to murder her.
- e. Plaintiff Pearce clearly knew that she had nothing to fear from the Defendants, and only made this flamboyant display to act as provocateur.
- f. I can barely even believe I am reading something so insane, much less that it survived a motion to dismiss.

219. This pattern of only being able to attribute such alleged wrongs to unnamed participants, without evidence, is indicative of how badly lacking in merit this case is. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

220. This begs the question why Plaintiff Pearce did not remain in the designated areas which Plaintiffs had obtained permits for, instead of confronting their political opponents at their permitted area.

- a. Throwing bottles of foul fluid is not a common tactic of Defendants, it is a tactic of Antifa, the associates of the Plaintiffs.
- b. Another tactic of Antifa, is to accuse their opponents of exactly the wrongs they themselves carried out, and this appears to be the case with this allegation.
- c. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

221. If the Plaintiffs were in Lee Park, they were not peaceful protesters. They were invading the space Defendants had obtained a permit for, and intentionally entered this area to provoke confrontations. Aside from that, Defendant Cantwell was pepper sprayed without provocation by Plaintiffs' associate Mike Longo Jr. while walking to the park, as shown in Exhibit6-CantwellMaced.mp4 and Exhibit7-CantwellMacedFirstPerson.mp4, and was thus unaware of almost anything that happened after. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth

of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

3) Due To Violence By Plaintiffs And Their Associates, The Authorities Declared the Rally an Unlawful Assembly and Defendants Were Forced To Fight Their Way Out As Plaintiffs And Their Associates Attacked Defendants

222. Consistent with the unlawful attempts to deny Defendants their right to hold a permitted demonstration, an unlawful assembly was declared. Defendant Cantwell was pepper sprayed without provocation by Plaintiffs' associate Mike Longo Jr. while walking to the park, as shown in Exhibit6-CantwellMaced.mp4 and Exhibit7-CantwellMacedFirstPerson.mp4, and was thus unaware of almost anything that happened after. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

223. Defendant Cantwell was pepper sprayed without provocation by Plaintiffs' associate Mike Longo Jr. while walking to the park, as shown in Exhibit6-CantwellMaced.mp4 and Exhibit7-CantwellMacedFirstPerson.mp4,

and was thus unaware of almost anything that happened after. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

224. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

225. Defendant Cantwell got in a Van with Azzmador. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

226. This is the first Defendant Cantwell is hearing about Daily Stormer's referenced instructions. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and

denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

227. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

228. After Defendant Cantwell got to McIntyre Park, he got in his car, and went to his hotel to wash the pepper spray off himself. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

229. The "counter protesters" who pepper sprayed and beat us were indeed savages, but Cantwell wasn't there for the speech here referenced. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

230. Defendant Cantwell was washing pepper spray off himself in a cold shower by the time this allegedly occurred. Aside from that, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

231. Defendant Cantwell was washing pepper spray off himself in a cold shower by the time this allegedly occurred. Aside from that, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

232. This is a lie and Plaintiffs know it. This is a willful, malicious, and material deception upon this Court.

a. Defendants applied for a permit.

b. Defendants tried to keep their plans secret, to avoid confrontations with Plaintiffs.

- c. Defendants declined to engage Plaintiffs' Antifa criminal co-conspirators when they had a choice, such as in the Walmart parking lot on August 11th.
- d. Defendants called law enforcement to coordinate the UVA torch march, and specifically that Defendant Cantwell conditioned his participation in that event on police being present. (See Exhibit10-MeetClip.mp3)
- e. Cantwell repeatedly warned his audience to remain in compliance with the law, especially if they were carrying weapons. See Exhibit24-UTR-Updates-Blogpost.pdf
- f. Cantwell wore a body camera throughout the events in dispute.
- g. Cantwell spoke to a Charlottesville Detective on July 17th. See Exhibit17-CPDDetective20170717.mp3
- h. Cantwell warned his party not to engage Philly Antifa in the Walmart parking lot on August 11th.
- i. After the fight at UVA, Cantwell asked Mosley to put him in touch with his contacts in local law enforcement. See Exhibit18-SMS.xlsx
- j. While Cantwell was recovering from Mike Longo Jr.'s pepper spray assault, someone he could not see, said "We're gonna kill em!" and Cantwell replies "Don't kill anybody!" See Exhibit9-DontKill.mp4

233. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

234. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

4) Dwayne Dixon's Rifle

235. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs' co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

236. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs' co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

239. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs' co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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241. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs' co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic

is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

242. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs' co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

243. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs' co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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246. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs' co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually

inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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248. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

249. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic

is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

250. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

251. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

252. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

253. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

254. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually

inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

255. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

256. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

257. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic

is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

258. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Blocking traffic is illegal. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

259. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

260. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

261. Defendant Cantwell was back at his hotel recovering from being assaulted with pepper spray, unprovoked, by Plaintiffs co-conspirator Mike Longo Jr. of Philadelphia, by the time this allegedly occurred. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

5) After the Surviving the Assault by Plaintiffs and their Associates, Defendants Felt Fortunate To Have Escaped With Their Lives

262. Defendant Cantwell felt fortunate to have escaped this assault on him and his associates with his life, and likely said as much online. Aside from

that, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

263. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

264. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

265. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

266. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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268. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

269. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

270. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

271. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

272. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

273. Defendant Cantwell has no idea what Spencer said. As it pertains to Cantwell, this strained used of quotation marks and periods amounts to deception.

- a. Once again, Plaintiffs piece together unrelated bits of a conversation in the same set of quotes, rendering the meaning completely different than what was actually said.

- b. Defendant Cantwell said the violent criminals who attacked him and his associates wanted violence, and the Right was “meeting market demand” by fighting off the repeated assaults. He was adamant in stating that the violence was initiated by the Plaintiffs criminal associates.
- c. None of our people “killed anybody unjustly” because Dwayne Dixon threatened Fields with a rifle. See Exhibit23-DixonConfession.mp4
- d. None of our people “killed anybody unjustly” because violent criminals broke Fields’ windows with clubs.
- e. None of our people “killed anybody unjustly” because two people at the scene of the accident drew pistols on Fields.

274. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

275. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any

allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

276. Defendant Cantwell is very happy to have obtained this list, because it is good to know who the violent criminals were who attacked us.

277. Defendant Cantwell is very happy to have obtained this list, because it is good to know who the violent criminals were who attacked us.

III. Plaintiffs' Actions Have Caused and Will Continue to Cause Damage to Defendants

A. The Unlawful Acts By Plaintiffs, Co-Conspirators, and Others Acting at Their Direction Caused Serious Injury, Including To Defendants

1) Actions of Plaintiffs and their co-Conspirators Caused Serious Bodily Injury and Damage to Property of Defendants

278. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

279. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

280. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

281. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

282. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

2) Defendants Suffered And Continue To Suffer Serious Injuries

283. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

284. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

285. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

286. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

287. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

288. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

289. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

290. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

291. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

292. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

293. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

294. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

B. Plaintiffs Will Continue to Cause Violence and Intimidation Unless Restrained:

295. Defendant Cantwell was in jail by this point. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

296. Defendant Cantwell was in jail by this point. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

297. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

298. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any

allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

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300. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

301. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

302. This is a sick lie.

a. Defendant Cantwell showed his legally owned firearms to a reporter;

b. In North Carolina;

- c. days after the events in dispute;
- d. and said nothing about coming back to Charlottesville.
- e. There is no such thing as a “semi-automatic machine gun”.
- f. Defendant Cantwell said “I think a lot more people are going to die before we’re done” ... “because the blacks are offing [killing] each other in staggering numbers from coast to coast, and we don’t really want to be a part of that anymore”
- g. Defendant Cantwell was referencing violence BY OTHER PEOPLE, citing their violence as the reason he wants to BE SEPARATE FROM THEM, and Plaintiffs have maliciously, willfully, and materially deceived this Court by piecing together fragments of sentences and taking his words out of context.
- h. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

303. Defendant Cantwell was never in prison,

- a. he was in jail;

- b. until he was released due to the allegations against him being fabricated;
- c. as was shown in a preliminary hearing on November 9th, (See Exhibit15-CantwellPrelim.pdf) which resulted in his release on December 7th 2017.
- d. Cantwell is a professional entertainer, and of his fictional entertainment products, he indeed did say he wanted to turn it up to 11, rather than let these malicious lies silence him, and he went on to do just that.
- e. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

304. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

305. Notice how there's no violence unless Defendants are attacked by the violent criminal friends of Plaintiffs. Defendant Cantwell was in jail by this point. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

306. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

C. Defendants Continue To Exist, And Plaintiffs Cannot Tolerate This

307. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

308. Defendant Cantwell raised money using the sites referenced

- a. The 14 words references preventing the extinction of the White race, which Plaintiffs seem to find hateful and offensive, evidencing their racial animus toward Defendants.
- b. Since Cantwell had always expressed an abhorrence of socialism, his listeners coined the 1433 line, so as to not be associated with Adolf Hitler.

309. Defendant Cantwell was never in prison, and has never been convicted of a felony to get sent to one.

- a. Cantwell was in jail, on fabricated allegations supported by perjury.
- b. Defendant Cantwell made phone calls from jail, and
- c. those calls were recorded and released by associates on the outside.

310. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

311. As detailed in the above responses, Plaintiffs have only conjured an imaginary conspiracy theory, by calling upon supernatural psychic powers to determine the inner workings of their political opponents' hearts and minds.

- a. Even with these psychic powers, Plaintiffs have not so much as alleged that any named Defendant actually committed a crime.
- b. Even with these psychic powers, Plaintiffs have not so much as alleged that any named Defendant actually called for a crime to be committed.
- c. They have cited inflammatory language, often by unnamed individuals not party to this suit, none of which constitutes evidence of a conspiracy
- d. They have cited vague unpleasantness allegedly suffered by Plaintiffs, without attributing any of these acts to a named Defendant, often citing without evidence that unnamed individuals carried out these alleged acts.
- e. The only compulsion suffered by the City of Charlottesville with regard to the statues was from their own courts.
- f. On this basis, the allegations in this paragraph are denied by Defendant Cantwell.

312. Defendant Cantwell promoted the event, and encouraged people to attend.

- a. Cantwell played no part in logistics, and did not coordinate anything, save for the Radical Agenda Listeners' meetup on August 11th, at which no violence ensued, and which is not in dispute here

- b. Cantwell conditioned his attendance on the cooperation of law enforcement (See Exhibit10-MeetClip.mp3).
- c. After being warned repeatedly of threats by Plaintiffs' co-conspirators, Cantwell relayed those warnings to others through his website, encouraged them to be prepared to defend themselves, and warned them to be in compliance with the law at all times. See Exhibit24-UTR-Updates-Blogpost.pdf
- d. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

313. Plaintiffs have not even alleged in this complaint that any such thing took place, they have only called upon psychic powers to infer from completely lawful speech that this was the intent, and in the process, have ignored staggering amounts of evidence to the contrary. Aside from that answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of

conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

314. Again, Plaintiffs seem to summon psychic powers to determine the contents of conversations which they were not party to. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

315. This is 100% false, and I'll add, completely ridiculous.

- a. Plaintiffs have absolutely zero good faith reason to believe this, it is made up out of thin air, based only on their hostility toward Defendants and apparently, the aforementioned psychic powers, which are clearly not working very well.
- b. Cantwell hardly knew Kessler, and when they met for the first time on August 9th, they had lunch, and discussed matters which were completely devoid of violent criminal conspiracies, racially motivated or otherwise.

316. This is 100% false, and I'll add, contradicted by video evidence.

- a. Plaintiffs' counsel are in possession of Defendant Cantwell's body camera video, which captured every word of this event, a sample of which is here provided as Exhibit10-MeetClip.mp3
- b. The meeting was held to discuss coordination with law enforcement, our litigation against the city with the assistance of the ACLU, and plans to AVOID violence.

317. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

318. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

319. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

320. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

321. Defendant Cantwell cannot speak for Kessler or Mosely, whom he barely knew before the events in dispute. Plaintiffs are 100% certain that Defendant Cantwell did nothing of the sort, and have known this since before they filed this suit. This is a willful, malicious, and material deception upon this court.

a. Defendant Cantwell made a total of 13 Posts to the Charlottesville 2.0 Discord, and Plaintiffs have had access to these since prior to filing this suit.

i. None of those posts even hinted at anything illegal, Plaintiffs are well aware of this fact, and have been since prior to filing this meritless suit.

ii. See Exhibit16-CantwellDiscord.pdf – All Discord posts attributed to Defendant Cantwell from all the Discord servers which Leftist media outlet Unicorn Riot has released.

- iii. The first post from Cantwell is dated August 1st 2017, less than two weeks before the events in dispute, and standing in stark contrast to the alleged “months” of planning described in Plaintiffs’ conspiracy theory.
 - iv. This 1st of 13 total posts read “Hey guys, I’m just popping my head in to show my face. I don’t use Discord much, but I see a lot of alt righters using it, so perhaps I should start.” Showing that Defendant Cantwell barely used this system, and contradicting the allegations in this and other paragraphs.
- b. While Plaintiffs are able to produce many “edgy” posts from the Charlottesville 2.0 Discord, most of them can only be attributed to anonymous and pseudonymous accounts which for all we know are the Plaintiffs.
- i. See Exhibit14-Unnamedandpseudonymous.pdf – Noting that nearly all “edgy” posts noted by Plaintiffs came from accounts which are not identified by the names of any Defendant.
- c. Even amongst the unattributed posts, none them are evidence of a conspiracy to break the law.
- d. As previously noted, none of those perfectly lawful edgy posts can be attributed to Defendant Cantwell.

- e. Defendant Cantwell had no moderation privileges on the Discord to stop them.
- f. As indicated by his first post on August 1st 2017, Defendant Cantwell was not in such regular use of the system to even have any awareness of such posts.
- g. While the Discord may have been “invite only” as a technical matter, it was clearly not “secret” or difficult to gain access to.
 - i. The logs were published by Unicorn Riot.
 - ii. The server had been infiltrated by associates and co-conspirators of the Plaintiffs, well in advance.
 - iii. Unicorn Riot leaked 67 different Right wing Discord servers.

This necessarily implies a deep infiltration of the ranks of Defendants’ various associations which, given the invite only nature of the platforms, implies a great deal of deception had to have been involved.
 - iv. For example, see this Tweet by Charlottesville resident Emily Gorcenski, who bragged about how their “intel networks” had “outclassed ... the cops” and how they used the information gathered to “disrupt” the permitted demonstration Defendants had planned.

v. or example, see this Tweet by Emily F



vi. Gorcenski is a self proclaimed "Antifa" adherent, and dangerous extremist, as can be seen in Exhibit13-

GorcenskiDangerousAntifa.pdf

h. In any case, while the guilt by association made by citing the unattributed posts, may be used to describe the moderators as derelict

in their duties, it is nothing short of defamatory to associate Defendant Cantwell with anything unlawful on the Discord server.

- i. Aside from that, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

322. Defendant Cantwell advised people who were bringing weapons to obey the law, as shown in Exhibit24-UTR-Updates-Blogpost.pdf. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

323. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

324. Answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

325. Defendant Cantwell raised money for himself, as he has done for years, and continues to do, in his capacity as a professional entertainer.

- a. Cantwell neither planned, nor engaged in, any unlawful activity, and Plaintiffs have not even credibly alleged so in this complaint, other than to summon upon the aforementioned poorly functioning psychic powers.
- b. Cantwell did not provide financial or logistical support for anyone else.
- c. Cantwell never so much as contemplated legal support for himself or anyone else, as evidence by his struggle to find an attorney for himself, in the wake of this mess.
- d. It is not a crime to raise money, as evidenced by the \$10,000,000+ budget of the Plaintiffs!
- e. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and

denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

326. Admitted

327. This a lie. Plaintiffs know it is a lie.

- a. Plaintiffs' counsel are in possession of Defendant Cantwell's body camera video, which captured every word of this event, a sample of which is here provided as Exhibit10-MeetClip.mp3
- b. The meeting was held to discuss coordination with law enforcement, our litigation against the city with the assistance of the ACLU, and plans to AVOID violence.
- c. Plaintiffs have had this video for over a year, and it is implausible that they have not reviewed its contents in that time. They are purposely deceiving the court by describing the August 11th meeting in this way.

328. Defendant Cantwell participated in the march.

- a. Defendant Cantwell conditioned his participation in that march on the cooperation of law enforcement, as shown in the body camera video in possession of Plaintiffs' counsel, a sample of which is provided as Exhibit10-MeetClip.mp3

- b. When Cantwell's associated were assaulted by repeat offender violent criminal Thomas Massey, of Philadelphia, PA, Cantwell tried to stop the violence with his pepper spray keychain, before it got out of control.
- c. Unfortunately, Plaintiffs' co-conspirators had other plans.
- d. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

329. This is a lie disproven by video, and Plaintiffs have known this for well over a year.

- a. Cantwell's criminal charges were brought by perjurers who are not party to this suit.
 - i. The allegations brought by Goad & Gorcenski were complete fictions, as can be seen in Exhibit19-FightNarrated.mp4
 - ii. Two of the charges were dropped for lack of probable cause after a preliminary hearing. See Exhibit15-CantwellPrelim.pdf
 - iii. Cantwell sued his accusers for their false accusations. See Exhibit22-Cantwell-v-Gorcenski-Complaint.docx

- iv. After being bankrupted by that abuse, Cantwell pleaded guilty to two misdemeanors, and was released the same day. See Exhibit21-SignedPlea.pdf
- v. If Cantwell had done what he was accused of, he would be in prison.
- b. Defendant Cantwell pepper sprayed an unidentified violent criminal, known only as "Beanyman", who is not party to this suit.
- c. Neither Beanyman, nor Thomas Massey, nor anyone else engaged by Cantwell was a "peaceful protester" and Plaintiffs have known it the entire time.
- d. In the much talked about photograph of Cantwell deploying his pepper spray, we can see the injury Massey inflicted on Cantwell's fellow rallygoer.

i.



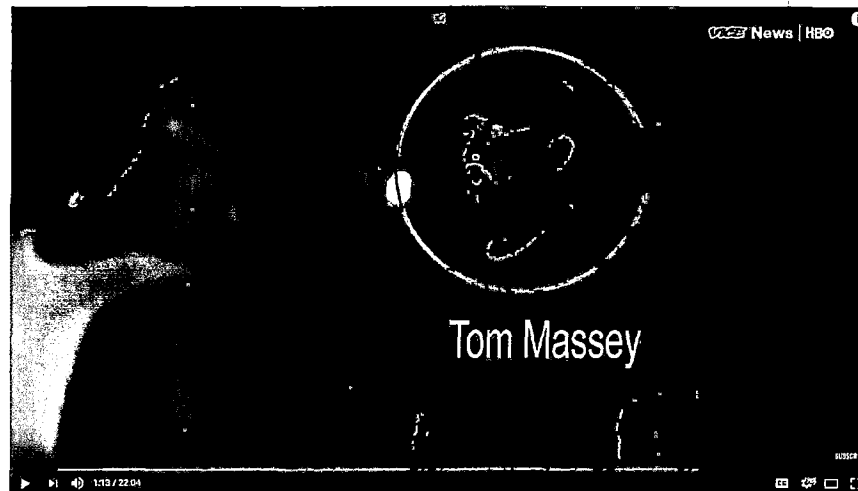
- e. Recall that Plaintiffs' criminal Antifa co-conspirators, if not Plaintiffs themselves, came to the gun free zone of UVA armed with guns, expandable batons, and pepper spray, to name just a few of their instruments of terror. While Defendant Cantwell was lawfully armed on August 12th, and had his pepper spray keychain at UVA on August 11th, only Plaintiffs' criminal associates were so brazen to bring at least one firearm, openly carried, to the UVA campus on August 11th.





f. Thomas Massey, of Philadelphia, threw the first punches of the August 11th demonstration at UVA, and would continue fighting through August 12th.

i. Massey can be seen here, in footage from the Vice News video



ii. See Exhibit1-Charge.mp4, at the end of which, Thomas Massey can be seen launching the first attack, which set off all the violence of the weekend in question.

iii. See that attack from another angle in Exhibit2-Attack.mp4

iv. See Exhibit4-CantwellDefends.mp4, in which Beanyman and Tom Massey can both be seen attacking the man in the white tank top.

v. In Exhibit4-CantwellDefends.mp4, Beanyman and Tom Massey can both be seen attacking the man in the white tank top, BEFORE Cantwell deploys his pepper spray.

- vi. Thomas Massey was quoted in the Washington Post after his arrest for rioting on the day of President Trump's Inauguration;

"I think there should have been more violence yesterday," said Massey, who was among those arrested. Asked if he participated in the violence, Massey replied, "There were some rocks thrown." He said that he hopes next time, demonstrations will be "more successful. I'll get to punch a Nazi. I didn't get to do that yesterday. The police stopped me."

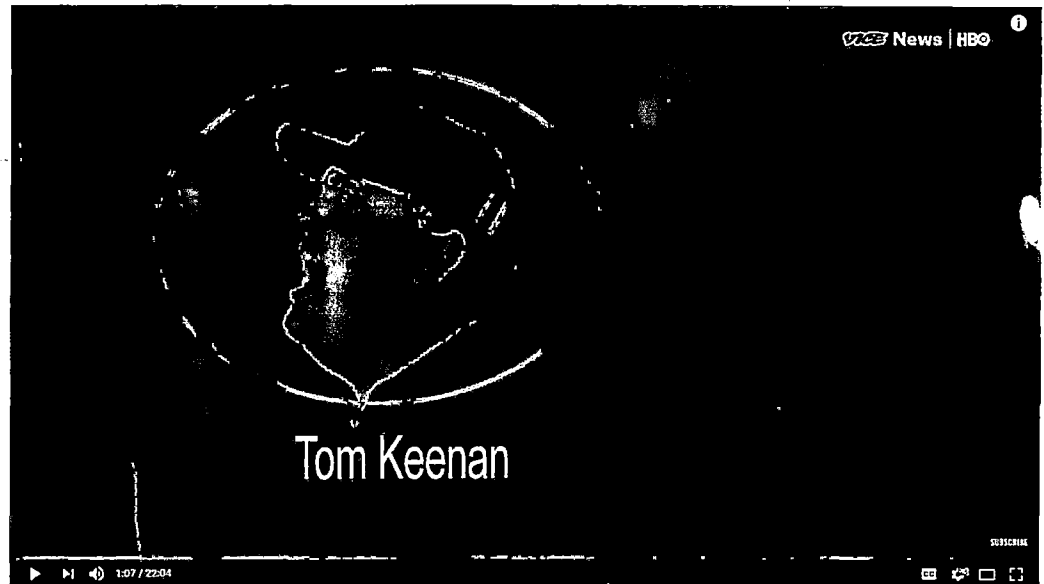
https://www.washingtonpost.com/local/public-safety/protesters-who-destroyed-property-on-inauguration-day-part-of-well-organized-group/2017/01/21/096678c8-dfeb-11e6-ad42-f3375f271c9c_story.html

- vii. After the events here in dispute, Massey was later charged with robbery and ethnic intimidation of two US Marines, when he and his co-conspirators did to two US Marines, what they tried to do to Defendants in Charlottesville.

<https://www.phillymag.com/news/2018/12/13/marines-assaulted-philadelphia-keenan-massey-antifa/>

- g. Tom Keenan, also of Philadelphia, was also at UVA, and involved in initiating the violence.

- i. Keenan can be seen in the Vice News footage of the event



- ii. Keenan had been arrested as far back as 2007 for breaking the windows out of an FBI vehicle which he thought belonged to some White Supremacists he had been stalking on the streets of Philadelphia.



<http://antiantifa-usa.blogspot.com/2009/05/philadelphias-love-park-4-begging-for.html>

iii. Keenan is also charged as Massey's co-defendant in the
aforementioned robbery and ethnic intimidation case, for doing
to two US Marines what they attempted to do to Defendants in
Charlottesville.

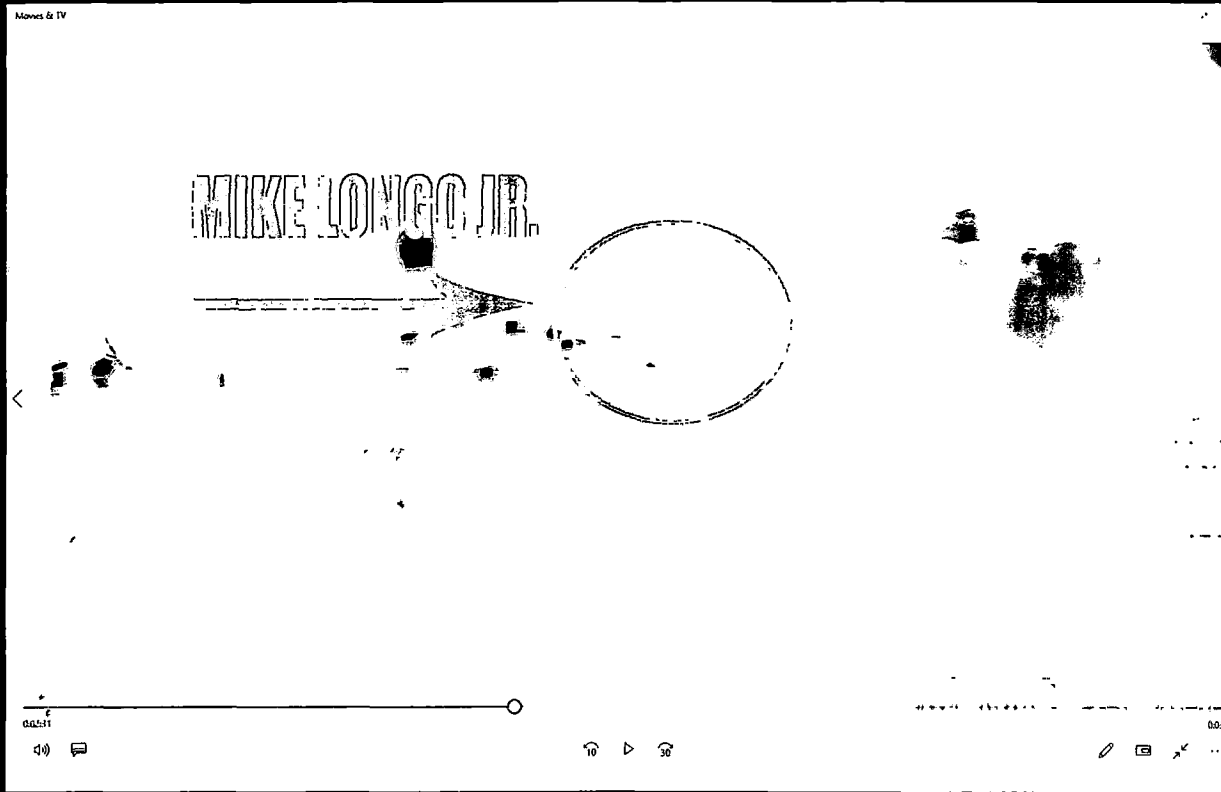
<https://www.phillymag.com/news/2018/12/13/marines-assaulted-philadelphia-keenan-massey-antifa/>

h. Mike Longo Jr., also of Philadelphia, who was already on probation
(See Exhibit11-MikeLongoCPRreport.pdf) in his home city for fighting
when he came to Charlottesville that weekend, was seen with pepper
spray at UVA on August 11th, and pepper sprayed Cantwell on August
12th, as well as a reporter.

Exhibit6-CantwellMaced.mp4

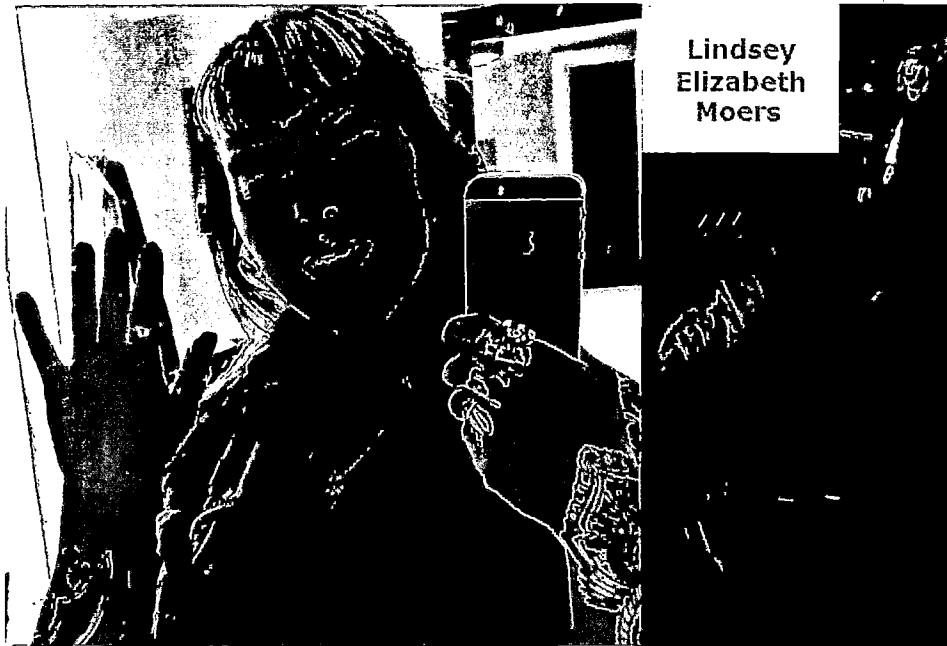
Exhibit7-CantwellMacedFirstPerson.mp4

i.



j. Lindsay Elizabeth Moers, also of Philadelphia, who has been violent at numerous demonstrations, was swinging an expandable baton at Defendants at UVA on August 11th, and on August 12th.

k.



330. Defendants defended themselves against an assault by Plaintiffs co-conspirators.

331. As has been illustrated in sparkling detail throughout the responses to prior paragraphs, this is total fiction so far as it pertains to Defendant Cantwell, and while Cantwell cannot account for the actions of others, the clear intent by Plaintiffs' criminal associates to criminally interfere with Defendants rights, renders the rest of the allegations of this paragraph unbelievable.

332. This is false, as has been exhaustively shown in responses to prior paragraphs.

- a. Defendant Cantwell was not a leader or organizer of the events in dispute
- b. The only event Cantwell organized, the Radical Agenda Listeners' Meetup on August 11th, resulted in no violence, despite the provocations of Philly Antifa.
- c. Defendant Cantwell was pepper sprayed by Plaintiffs' associate Mike Longo Jr. of Philadelphia while entering the park, and was incapacitated by this premeditated assault, as shown in Exhibit6-CantwellMaced.mp4, Exhibit7-CantwellMacedFirstPerson.mp4, and Exhibit9-DontKill.mp4.
- d. As a result of this unprovoked assault, Cantwell was incapacitated, and had no ability to know what was happening, much less direct it.
- e. Cantwell conditioned his participation in these events on the cooperation of law enforcement, as shown in Exhibit10-MeetClip.mp3
- f. While Cantwell cannot account for the actions of others, the clear intent by Plaintiffs' criminal associates to criminally interfere with Defendants rights, renders the rest of the allegations of this paragraph unbelievable.

333. This has been refuted repeatedly throughout this response and does not warrant further repetition, and is on that basis denied.

334. Defendant Fields fled from the rifle of Dwayne Dixon, and what happened to him is a tragedy, and a travesty of justice. Exhibit23-DixonConfession.mp4

CAUSES OF ACTION

COUNT I: 42 U.S.C. § 1985(3)

335. Answering Defendant incorporates herein all previous admissions and denials.

336. Answering Defendant denies he is liable to Plaintiffs or any one of them.

337. As has been exhaustively detailed, Cantwell did nothing of the sort.

338. As has been exhaustively detailed, Cantwell did nothing of the sort.

339. As has been exhaustively detailed, Cantwell did nothing of the sort.

340. Cantwell cannot answer for unnamed person he does not know, and had no control over, for acts he is unaware of, and for which Plaintiffs provide no evidence.

341. As has been exhaustively detailed, Cantwell did nothing of the sort.

342. Denied so far as it pertains to Defendant Cantwell, including with respect to the allegation that, pursuant to the 13th Amendment to the United States Constitution, Plaintiffs have "rights to be free of the badges and incidents of slavery." Absent enactment by Congress of legislation under Section 2 of the 13th Amendment by which the Congress bans some badge or incident of slavery, there is no civilly enforceable right to be free or such a badge or incident and, therefore, no cause of action exists under 42 U.S.C. Section 1985(3) or 42 U.S.C. Section 1986. Aside from that, answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis, deny those allegations, and denies as factually inaccurate any allegations of conspiracy or the planning, intending, committing or ratifying of unlawful acts in this paragraph.

343. Plaintiffs have not so much as alleged that Cantwell did anything at all to any of them, and Cantwell nonetheless denies the implication of this paragraph. Defendant Cantwell has yet to see any credible claim of damages by any of the Plaintiffs, doubts their veracity in the extreme, and demands strict proof.

COUNT II: 42 U.S.C. § 1986

344. Answering Defendant incorporates herein all previous admissions and denials.

345. Answering Defendant denies he is liable to Plaintiffs or any one of them.

346. As has been exhaustively detailed, Cantwell did nothing of the sort.

347. Defendant Cantwell, as Plaintiffs well know, had nothing to do with “organizing” this event. With the single possible exception of the Radical Agenda listener’s meetup previously referenced in the Walmart Parking lot, at which no violence ensued, any implication that Defendant Cantwell was involved in the planning of the events in dispute, other than to demand police protection, or that he was in any position to be issuing “orders”, or controlling the behavior of others, is just plain factually incorrect, and the Plaintiffs have known this the entire time. Despite his non-leadership status, Defendant Cantwell went to extraordinary lengths to avoid the violence which Plaintiffs’ Antifa associates had vowed to visit upon these lawful demonstrations.

a. Defendant Cantwell could accurately be described as participant, speaker, and promoter, but neither organizer nor leader, and certainly was in no position to be giving orders, nor taking responsibility for the words and deeds of total strangers he had no control over.

i. Defendant Cantwell only became aware of the United the Right rally by people calling into his online radio show about it.

- ii. Cantwell had contemplated attending only as a spectator, until June 6th when, as Plaintiffs were made aware during discovery over a year ago, Augustus Invictus texted him “Yo [redacted]! I know you're coming to Charlottesville, right? You want to make a speech?” and after a subsequent phone call, provided the invite link to the Discord server. (See Exhibit18-SMS.xlsx a redacted version of the text messages provided to Plaintiffs during discovery)
- iii. See Exhibit16-CantwellDiscord.pdf – All Discord posts attributed to Defendant Cantwell from all the Discord servers which Leftist media outlet Unicorn Riot has released.
- iv. The first post from Cantwell is dated August 1st 2017, less than two weeks before the events in dispute, hardly enough time to organize a violent criminal conspiracy with perfect strangers.
- v. This 1st of 13 total posts read “Hey guys, I'm just popping my head in to show my face. I don't use Discord much, but I see a lot of alt righters using it, so perhaps I should start.” – and hardly an indication of leadership.
- vi. None of the other posts attributable to Defendant Cantwell, on Charlottesville 2.0, or any other Discord Server, could qualify him as being a leader or organizer.

vii. Though Plaintiffs have cherrypicked out of context quotes from years of Defendant Cantwell's media production career, in the hopes of portraying him in the worst possible light, none of those posts ever mentioned the UVA event before it happened, and none have identified him in any other leadership capacity, save for the lawful and nonviolent Radical Agenda Listeners' Meetup on August 11th.

b. Cantwell, and other defendants, nonetheless took measures to avoid and minimize violence.

- i. Defendants applied for a permit.
- ii. Defendants tried to keep their plans secret, to avoid confrontations with Plaintiffs.
- iii. Defendants declined to engage Plaintiffs' Antifa criminal co-conspirators when they had a choice, such as in the Walmart parking lot on August 11th.
- iv. Defendants called law enforcement to coordinate the UVA torch march, and specifically that Defendant Cantwell conditioned his participation in that event on police being present. (See Exhibit10-MeetClip.mp3)

- v. Cantwell repeatedly warned his audience to remain in compliance with the law, especially if they were carrying weapons. See Exhibit24-UTR-Updates-Blogpost.pdf
- vi. Cantwell wore a body camera throughout the events in dispute.
- vii. Cantwell spoke to a Charlottesville Detective on July 17th. See Exhibit17-CPDDetective20170717.mp3
- viii. Cantwell warned his party not to engage Philly Antifa in the Walmart parking lot on August 11th.
- ix. After the fight at UVA, Cantwell asked Mosley to put him in touch with his contacts in local law enforcement. See Exhibit18-SMS.xlsx
- x. While Cantwell was recovering from Mike Longo Jr.'s pepper spray assault, someone he could not see, said "We're gonna kill em!" and Cantwell replies "Don't kill anybody!" See Exhibit9-DontKill.mp4

348. As has been illustrated in exhaustive responses to prior paragraphs, despite not being a leader or organizer of the event, Cantwell, along with other Defendants, took many steps to prevent the violence described.

349. As has been illustrated in exhaustive responses to prior paragraphs, despite not being a leader or organizer of the event, Cantwell, along with other Defendants, took many steps to prevent the violence described.

350. Plaintiffs have yet to show any credible evidence of injury, certainly none which can be attributed to Defendant Cantwell, and as has been exhaustively illustrated above, no such conspiracy ever existed.

COUNT III: CIVIL CONSPIRACY

351. Answering Defendant incorporates herein all previous admissions and denials.

352. Answering Defendant denies he is liable to Plaintiffs or any one of them.

353. As has been exhaustively detailed, Cantwell did nothing of the sort.

a. As has been exhaustively detailed, Cantwell did nothing of the sort.

b. As has been exhaustively detailed, Cantwell did nothing of the sort.

c. As has been exhaustively detailed, Cantwell did nothing of the sort.

d. As has been exhaustively detailed, Cantwell did nothing of the sort.

e. As has been exhaustively detailed, Cantwell did nothing of the sort.

- f. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - g. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - h. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - i. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - j. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - k. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - l. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - m. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - n. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - o. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - p. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - q. As has been exhaustively detailed, Cantwell did nothing of the sort.
 - r. As has been exhaustively detailed, Cantwell did nothing of the sort.
354. No credible report of injury has been provided in this complaint, and certainly none which can be attributed to Defendant Cantwell. No such conspiracy by Plaintiffs ever existed, and Plaintiffs have not even brought a

credible allegation of one. All evidence contradicts the insinuations brought by Plaintiffs, and the allegations of this paragraph are thus denied.

355. Answering Defendant denies he is liable to Plaintiffs or any one of them.

COUNT IV: NEGLIGENCE PER SE

(By Plaintiffs Muftiz, Sines, Blair, Martin, Alvaraclo, Baker, and Romero

Against Defendant Fields)

356. Answering Defendant incorporates herein all previous admissions and denials.

357. This paragraph does not seem to warrant a response from Defendant Cantwell.

358. This paragraph does not seem to warrant a response from Defendant Cantwell.

359. This paragraph does not seem to warrant a response from Defendant Cantwell.

360. This paragraph does not seem to warrant a response from Defendant Cantwell.

361. This paragraph does not seem to warrant a response from Defendant Cantwell.

362. This paragraph does not seem to warrant a response from Defendant Cantwell.

363. This paragraph does not seem to warrant a response from Defendant Cantwell.

COUNT V: VIOLATION OF VIRGINIA CODE§ 8.01-42.1

CIVIL ACTION FOR RACIAL, RELIGIOUS, OR ETHNIC HARASSMENT

(By Plaintiffs Wispelwey, Muftiz, John Doe, Sines, Blair, Martin, Alvarado, and Romero

Against Defendants Fields, Mosley, Spencer, Kessler, Ray, Cantwell, and Invictus)

364. Answering Defendant incorporates herein all previous admissions and denials.

365. Defendant is not required to admit or deny the allegations of Paragraph 365 because they merely state a legal conclusion

366. Defendant denies the allegations of Paragraph 366 to the extent that they apply to him. Defendant lacks sufficient information to admit or deny the remaining allegations of Paragraph 366 and, therefore, demands strict proof thereof.

367. Defendant denies the allegations of Paragraph 367 to the extent that they apply to him. Defendant lacks sufficient information to admit or deny the remaining allegations of Paragraph 367 and, therefore, demands strict proof thereof.

COUNT VI: ASSAULT AND BATTERY

(By Plaintiffs Muniz, Sines, Blair, Martin, Alvarado, Baker, and Romero Against Defendant Fields)

368. Answering Defendant incorporates herein all previous admissions and denials.

369. Defendant denies the allegations of Paragraph 369 to the extent that they apply to him. Defendant lacks sufficient information to admit or deny the remaining allegations of Paragraph 369 and, therefore, demands strict proof thereof.

COUNT VII: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(By Plaintiffs Muniz, Sines, Blair, Martin, Alvarado, Baker, and Romero Against Defendant Fields)

370. Answering Defendant incorporates herein all previous admissions and denials.

371. Defendant denies the allegations of Paragraph 371 to the extent that they apply to him. Defendant lacks sufficient information to admit or deny

the remaining allegations of Paragraph 371 and, therefore, demands strict proof thereof.

372. Defendant denies the allegations of Paragraph 372 to the extent that they apply to him. Defendant lacks sufficient information to admit or deny the remaining allegations of Paragraph 372 and, therefore, demands strict proof thereof.

Plaintiffs' Prayer For Relief

373. No response to said Paragraphs is required because they do not allege facts. Notwithstanding said reservation, but without waiving it, Defendant denies Plaintiffs are entitled to any of the relief requested.

374. No response to said Paragraphs is required because they do not allege facts. Notwithstanding said reservation, but without waiving it, Defendant denies Plaintiffs are entitled to any of the relief requested.

375. No response to said Paragraphs is required because they do not allege facts. Notwithstanding said reservation, but without waiving it, Defendant denies Plaintiffs are entitled to any of the relief requested.

376. No response to said Paragraphs is required because they do not allege facts. Notwithstanding said reservation, but without waiving it, Defendant denies Plaintiffs are entitled to any of the relief requested.

377. No response to said Paragraphs is required because they do not allege facts. Notwithstanding said reservation, but without waiving it, Defendant denies Plaintiffs are entitled to any of the relief requested.

Defenses

Settlement and release, Collateral Estoppel:

378. Plaintiffs have referenced criminal charges which were brought against Cantwell in Albemarle County (22), a photograph used as evidence of those charges (171), and the act of deploying pepper spray depicted in said photo, which resulted in the charges (171, 329).

379. Two of those charges were dropped for lack of probable cause when it was shown that the allegations were fabricated, and the complainants had contradicted sworn testimony, which itself was contradicted by video. Two other charges were later pleaded down to misdemeanors.

380. Cantwell sued his accusers for malicious prosecution, and they countersued him for assault, citing the alleged acts of "overt violence", which were themselves referenced by Judge Moon in his denial of Cantwell's motion to dismiss.

381. After accepting the misdemeanor plea agreement, Cantwell and his accusers signed a mutual release of all claims.

382. Those accusers are thus not party to this suit, nor could they be, and these allegations and charges are thus neither actionable nor relevant in this case.

Failure to State A Claim

383. In his denial of Cantwell's motion to dismiss, Judge Moon stated
"While Defendant Cantwell may have been lower in the pecking order than either Kessler or Spencer, he is more closely tied to acts of overt violence in furtherance of the conspiracy than either of them."

384. As previously shown, the only acts of "overt violence" allegedly attributable to Cantwell were settled in another case. Defendant thus requests that motion be reconsidered in light of those facts.

385. The efforts to tie Defendant Cantwell to this conspiracy theory, aside from being a malicious lie contradicted by an abundance of evidence, are thin even as alleged.

386. Aside from the "overt violence" which was settled by a mutual release of all claims in another case, Plaintiffs have only alleged that Cantwell;

a. made jokes they find offensive (22,308),

- b. had lunch with an organizer (64,315),
- c. showed up to a park (65,316,327),
- d. was present in a chat room he barely used (73,321),
- e. encouraged those with a license to conceal their firearms rather than open carry (106,322),
- f. begged for money online (126,308,325),
- g. attended a demonstration (142,156,158,159,186,328),
- h. went to Walmart (150),
- i. talked to reporters (150,273,302),
- j. got in a van while fleeing for his safety (225),
- k. was mentioned by a blogger in a foreign country (226),
- l. received a link to a website months after the events in dispute (277),
- m. possessed legal firearms in North Carolina (302),
- n. is a professional entertainer (303,309),
- o. had his name on a picture someone else produced (326),

387. Plaintiffs do not allege the violation of any right protected against infringement by private actors.

388. The United States Congress has not enacted any legislation proscribing, or creating a private cause of action with respect to, the putative badges and incidents of slavery alleged herein (such as a putative right to be free of racially motivated violence).

389. Those Plaintiffs who are not African-American do not have any rights under the 13th Amendment to the United States Constitution to be free from alleged badges and incidents of slavery.

390. Section 8.01-42.1, Code of Virginia, is overly broad and unduly vague and, therefore, violates the 1st, 5th and 14th Amendments to the United States Constitution and Article I, Sections 11 and 12 of the Constitution of Virginia.

391. Plaintiffs have not adequately pleaded either statutory conspiracy under Section 1985(3) or common law conspiracy under Virginia law.

392. Defendant incorporates herein by reference the arguments that his attorney set forth in his earlier Motion to Dismiss, as well as brief in support thereof, and to the extent applicable, arguments in his co-Defendants' motions to the same effect.

Lack of Standing

393. As previously established, the only parties who allege to have been injured by Defendant Cantwell have already signed a mutual release of all claims to discharge a separate lawsuit. Plaintiffs in this case cannot sue

Cantwell for alleged and unproven injuries to another party who already released all claims.

Intervening Cause

394. Defendant Cantwell cannot be sued for words and deeds of people and things he had no knowledge nor control over, who and which may or may not have planned or engaged in unlawful or tortious acts.

395. Among those engaged in violence on August 11th and 12th, the worst offenders were Left wing “counter protesters” aka violent Antifa criminals. Included amongst them were;

- a. Dwayne Dixon, and other members of Redneck Revolt, who admitted to pointing rifles at people, most notably, James Fields. Exhibit23-DixonConfession.mp4
- b. Thomas Massey, Tom Keenan, Mike Longo Jr., Lindsay Elizabeth Moers, Paul Minton, and others collectively known as “Philly Antifa” as well as other various violent communist agitators.
- c. Neither Cantwell nor any Defendants in this case can be held liable for the violent and criminal behavior by Plaintiffs’ criminal co-conspirators, nor the chain reactions that resulted from those criminal acts, such as the car accident involving Defendant Fields.

396. While Cantwell is falsely and vaguely described as having taken part in the organizing of the event, issuing orders, and conspiring, no specific

allegations of that nature are made, because none exist. More to the point, Plaintiffs do not allege that Cantwell had any part in choosing who would participate in the event, nor do they allege that Cantwell had any meaningful knowledge of such attendees, and as such, he could not conceivably have any control over them, nor any responsibility for their words or deeds.

397. Plaintiffs do not allege Cantwell had any moderation privileges over the Discord server, the contents of which make up the bulk of their conspiracy theory. Cantwell cannot be held liable for the words of people he had no capacity to moderate.

398. Though Plaintiffs falsely claim Cantwell participated in the “direction, planning, and inciting of unlawful and violent acts through Discord” (73) they haven’t done so plausibly by attributing any such posts to Cantwell, because no such posts exist. There is nothing showing that Cantwell had any knowledge of these posts, because he did not, nor did he have any obligation to know. Cantwell cannot be held liable for that which he had no knowledge of, or obligation to know of.

399. Though Plaintiffs falsely and maliciously claim that Defendant Cantwell “participated in the violent events of” August 12th, they have not done so plausibly by attributing any violence to him, because they cannot so do.

- a. Cantwell was pepper sprayed by a co-conspirator of the Plaintiffs named Mike Longo Jr. from Philadelphia on August 12th before getting near Lee Park, and had to be carried in. See Exhibit6-CantwellMaced.mp4, Exhibit7-CantwellMacedFirstPerson.mp4, and Exhibit8-CPDMisdemeanor.mp3
- b. Plaintiffs know this, because they have had video of it for over a year.
- c. Still half blind, Cantwell fled for fear of his life after police issued an order to disperse, and his associates lost the protection of the park.
- d. From there he went back to his hotel room, and rinsed the caustic spray off his body in a cold shower.
- e. Plaintiffs cannot sue Cantwell for things which happened while he was recovering from an assault perpetrated by their co-conspirator, and thus had no capacity to do anything to prevent.

400. Due to the above stated facts, any illegal activity by others was no more in control of Defendant Cantwell than a hurricane or wild animal.

Assumption of the Risk, Failure to Mitigate

401. Plaintiffs assumed and unreasonably disregarded the risk their actions would result in their own personal injury.

402. Plaintiffs are, or were knowingly associated with, "Antifa", a violent extremist group well known for attacking lawful demonstrations by Right of

center groups.

Amongst those dangerous criminals were, to name just a few;

- a. Emily Gorcenski, a dangerous extremist who said on August 9th “We throw bricks so y'all [expletive]s can have proggy feels about gay marriage” and later bragged on Twitter about Antifa “intel networks” and how they were used to “disrupt” Defendants’ activities that weekend. (See Exhibit13-GorcenskiDangerousAntifa.pdf attached)



Emily Ghoulcenski ✓ @EmilyGorcenski · Aug 9, 2017

Here's an idea: white cis men don't get a say in how trans women of color respond to gender and racial oppression.

8

11

86



Emily Ghoulcenski ✓
@EmilyGorcenski

We throw bricks so y'all motherfuckers can have proggy
feels about gay marriage

8:22 AM · Aug 9, 2017 · Twitter for Android

2 Retweets 41 Likes



Emily G, Cville. @EmilyGorcenski

One story that hasn't been told about #Charlottesville is how our intel networks dramatically outclassed both the alt-right's and the cops'.

7:34 AM - 19 Aug 2017

150 Retweets 393 Likes



10



150

393



Emily G, Cville. @EmilyGorcenski · 19 Aug 2017

Replying to @EmilyGorcenski

Civilian-gathered intel is often not taken seriously by authorities, but we used it widely to plan, disrupt, monitor, and respond.



2



36

182



Emily G, Cville. @EmilyGorcenski · 19 Aug 2017

The reason media was at Cantwell's walmart gathering? Our intel. The torch rally? Our intel.



3



34

174



Emily G, Cville. @EmilyGorcenski · 19 Aug 2017

We strategically leaked info knowing they were watching and processed their reactions in real time.



1



27

144

- b. Thomas Massey, of Philadelphia, who was quoted in the Washington Post after his arrest for rioting on the day of President Trump's Inauguration;

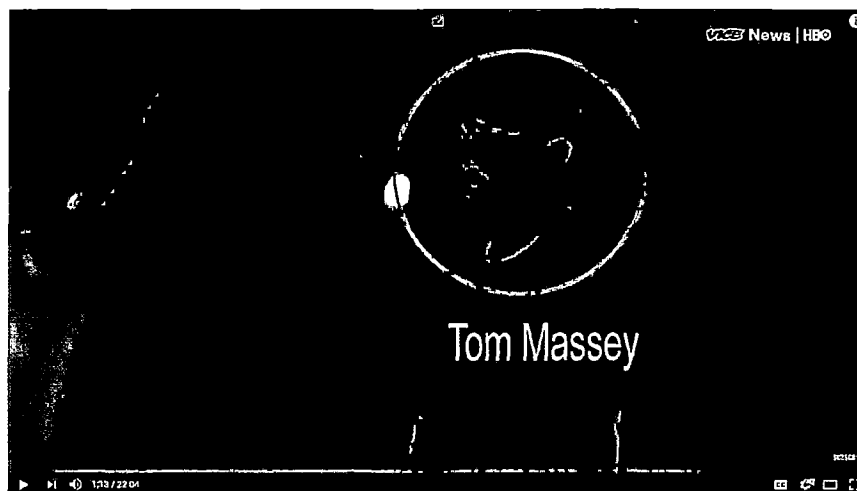
"I think there should have been more violence yesterday," said Massey, who was among those arrested. Asked if he participated in the

violence, Massey replied, "There were some rocks thrown." He said that he hopes next time, demonstrations will be "more successful. I'll get to punch a Nazi. I didn't get to do that yesterday. The police stopped me."

https://www.washingtonpost.com/local/public-safety/protesters-who-destroyed-property-on-inauguration-day-part-of-well-organized-group/2017/01/21/096678c8-dfeb-11e6-ad42-f3375f271c9c_story.html

After the events here in dispute, Massey was later charged with robbery and ethnic intimidation of two US Marines, when he and his co-conspirators did to two US Marines, what they tried to do to Defendants in Charlottesville.

<https://www.phillymag.com/news/2018/12/13/marines-assaulted-philadelphia-keenan-massey-antifa/>



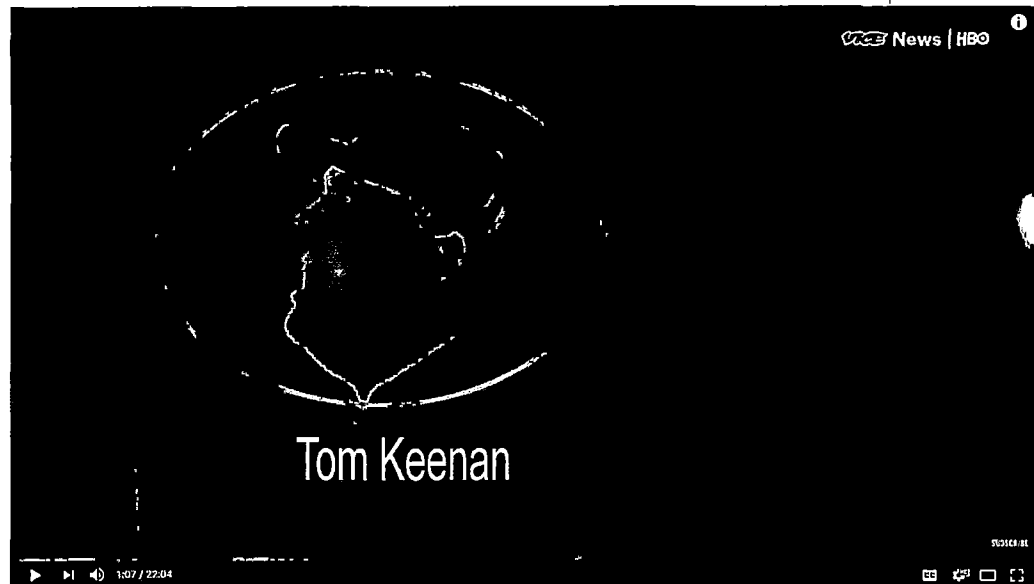
- c. Tom Keenan, also of Philadelphia, who had been arrested as far back as 2007 for breaking the windows out of an FBI vehicle which he thought belonged to some White Supremacists he had been stalking on the streets of Philadelphia.



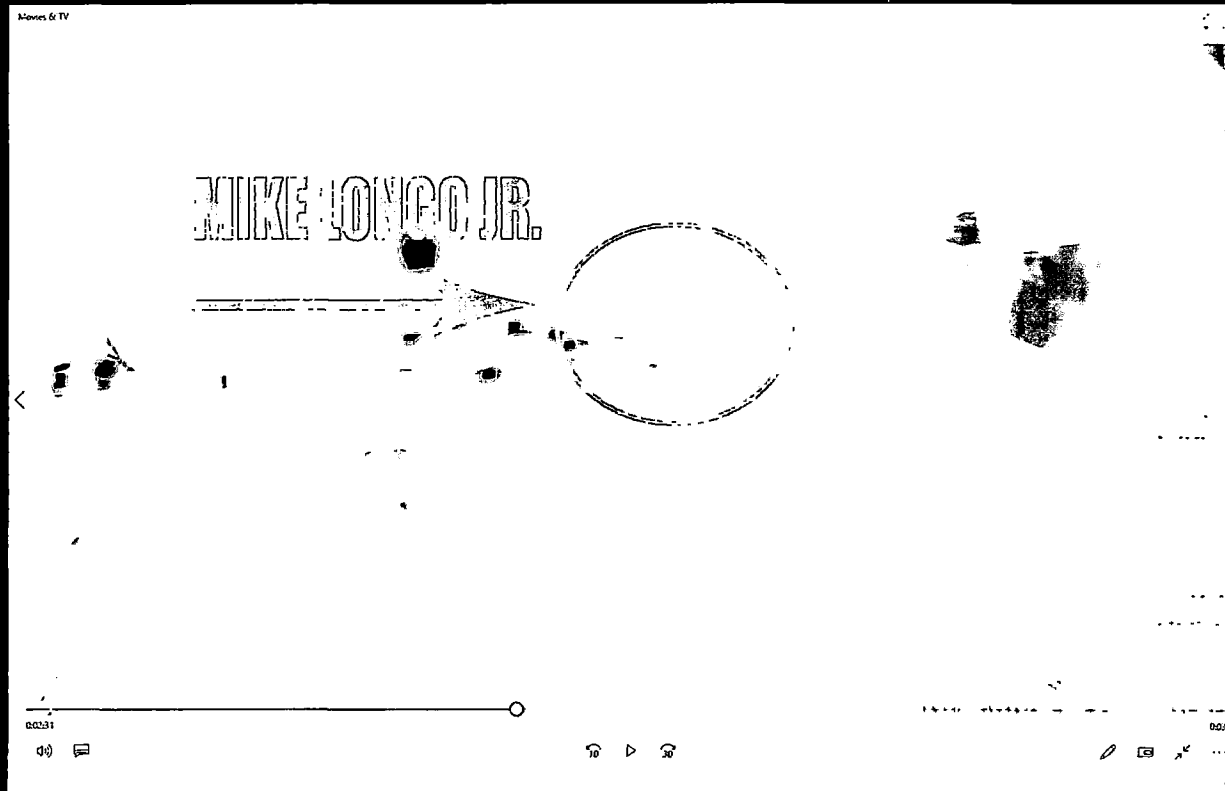
<http://antiantifa-usa.blogspot.com/2009/05/philadelphias-love-park-4-begging-for.html>

Keenan is also charged as Massey's co-defendant in the aforementioned robbery and ethnic intimidation case, for doing to two US Marines what they attempted to do to Defendants in Charlottesville.

<https://www.phillymag.com/news/2018/12/13/marines-assaulted-philadelphia-keenan-massey-antifa/>



- d. Mike Longo Jr., also of Philadelphia, who was already on probation (See Exhibit11-MikeLongoCPRreport.pd) in his home city for fighting when he came to Charlottesville that weekend, was seen with pepper spray at UVA on August 11th, and pepper-sprayed Cantwell on August 12th, as well as a reporter.



- e. Lindsay Elizabeth Moers, also of Philadelphia, who has been violent at numerous demonstrations, and was swinging an expandable baton at Defendants at UVA on August 11th, and on August 12th.

